

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

In re:

GRIDDY ENERGY LLC,¹

Debtor.

Chapter 11

Case No. 21-30923 (MI)

CERTIFICATE OF NO OBJECTION TO FINAL ORDER (I) AUTHORIZING THE DEBTOR TO (A) CONTINUE OPERATING ITS CASH MANAGEMENT SYSTEM, (B) HONOR CERTAIN PREPETITION OBLIGATIONS, (C) MAINTAIN EXISTING BANK ACCOUNTS AND BUSINESS FORMS, AND (D) CONTINUE CERTAIN INTERCOMPANY TRANSACTIONS; AND (II) GRANTING RELATED RELIEF

1. On March 15, 2021, the debtor and debtor in possession in the above-captioned case (the “Debtor”) filed the *Debtor’s Emergency Motion for Entry of Interim and Final Orders (i) Authorizing the Debtor to (a) Continue Operating Its Cash Management System, (b) Honor Certain Prepetition Obligations, (c) Maintain Existing Bank Accounts and Business Forms, and (d) Continue Certain Intercompany Transactions; and (ii) Granting Related Relief* [Docket No. 12] (the “Motion”). On March 16, 2021, the Court entered an order approving the relief requested in the Motion on an interim basis [Docket No. 36] (the “Interim Order”). A proposed order granting the relief requested in the Motion on a final basis was attached as Exhibit B to the Motion (the “Original Proposed Final Order”).

2. On March 15, 2021, the Motion was served on (i) all parties registered to receive such service via the Court's CM/ECF; and (ii) the parties listed in the Motion. *See* Certificate of Service [Docket No. 26]. Further, on March 16, 2021, the Interim Order was served on (i) all

¹ The last four digits of its federal tax identification number of the Debtor are 1396. The mailing address for the Debtor is PO Box 1288, Greens Farms, CT 06838.

parties registered to receive such service via the Court's CM/ECF; and (ii) the parties listed in the Motion. *See* Certificate of Service [Docket No. 49].

3. Responses to the Motion were due April 9, 2021 at 5:00 p.m. (CDT) (the "Objection Deadline"). The Debtor agreed to extend the response deadline for the Official Committee of Unsecured Creditors (the "Committee") until April 12, 2021 at 4:00 p.m. (CDT). A revised proposed order (the "Revised Proposed Final Order") granting the relief requested in the Motion is attached hereto as Exhibit 1. Additionally, attached hereto as Exhibit 2 is a redline of the Revised Proposed Final Order reflecting changes from the Original Proposed Final Order. The Revised Proposed Final Order incorporates informal comments received from the Committee.

4. In accordance with Paragraph 41 of the *Procedures for Complex Chapter 11 Cases in the Southern District of Texas*, the undersigned counsel files this Certificate of No Objection and represents to the Court that (i) more than 24 hours have passed since the Objection Deadline, (ii) the undersigned counsel is unaware of any objections to entry to the Revised Proposed Final Order except for the Committee's comments that have been incorporated into the Revised Proposed Final Order and which the Committee has confirmed fully resolves its comments, and (iii) the undersigned counsel has reviewed the Court's docket and no objection or response to entry of the Revised Proposed Final Order appears thereon.

5. Therefore, the Debtor respectfully requests entry of the Revised Proposed Final Order.

Dated: April 13, 2021
New York, New York

BAKER BOTTS L.L.P.

By: /s/ Robin Spigel
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Proposed Counsel to the Debtor and Debtor in Possession

Certificate of Service

I certify that on April 13, 2021, I caused a copy of the foregoing document to be served by the Electronic Case Filing System for the United States Bankruptcy Court for the Southern District of Texas.

/s/ Robin Spigel